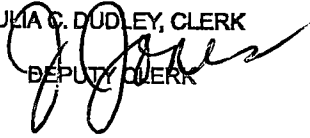


IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF VIRGINIA Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT
AT CHARLOTTESVILLE, VA
FILED

JUN 18 2020

JULIA C. DUDLEY, CLERK
BY: 
DEPUTY CLERK

ELIZABETH SINES, et al,
Plaintiff,

v.

Civil Action No. 3:17-cv-00072-NKM-JCH
ORAL ARGUMENT REQUESTED

JASON KESSLER, et al,
Defendant.

**MOTION TO STAY ORDER DENYING, IN PART,
MOTIONS TO QUASH SUBPOENAS DUCES TECUM
SERVED ON ATTORNEYS LUNSFORD AND HILL**

COMES NOW, attorneys Denise Y. Lunsford, Esquire ("Lunsford") and John I. Hill ("Hill") and request that this Court stay its June 12, 2020 Memorandum Opinion & Order, ECF No. 765, denying, in large part, Motions to Quash *subpoenas duces tecum* served by Plaintiffs (the "Order"). In support thereof, Lunsford & Hill state as follows:

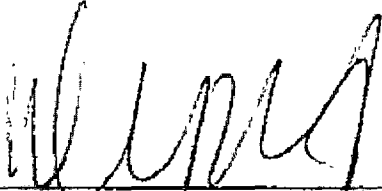
1. The Order provides that Lunsford and Hill produce, with limited exception, documents responsive to the *subpoenas duces tecum* within ten (10) days of the date of the Order.
2. Lunsford and Hill have begun the process of providing information responsive to the *subpoenas duces tecum* which was received from the Commonwealth and will continue to provide responsive information that is not privileged, work product, or covered by an Order of Court prohibiting disclosure.
3. Lunsford and Hill have filed a Motion to Reconsider this Courts Order and requested an evidentiary hearing and oral argument thereon.

4. Requiring production of information prior to a ruling on the Motion for Reconsider would result in irreparable harm to Lunsford and Hill including placing them in violation of the Order, other Orders of this Court, and orders of other Courts.
5. Lunsford and Hill have advised the Office of the United States Attorney of the Order and have requested assistance from that Office in determining which documents were provided by the Commonwealth, which were provided by the U.S. Attorney, and which documents originated from the Office of the United States Attorney but were provide to Lunsford and Hill by the Commonwealth. Such review will require additional time beyond the ten (10) day time period and is necessary to prevent Lunsford and Hill from violating either the Order or this Courts February 23, 2018 nondisclosure Order.
6. Documents responsive to the *subpoenas duces tecum* are voluminous. In addition to determining which documents are responsive, Lunsford and Hill must also determine which responsive documents are work product and which are privileged material and create a Privilege Log. The creation of such a log will require extensive time.
7. Alternately, Lunsford and Hill request that this Court extend the date by which responsive documents must be produced to ten (10) days after a hearing on their Motion to Reconsider.

WHEREFORE, for the foregoing reasons, Denise Y. Lunsford, Esq. and John I. Hill, Esq. respectfully request that this Court stay its June 12, 2020 Order denying, in large part, their Motions to Quash Subpoenas Duces Tecum or, alternately, extend the date by which responsive documents must be produced.

Respectfully submitted this 18th day of June, 2020.

DENISE Y. LUNSFORD, Esq.
JOHN I. HILL, Esq.
Pro Se



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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2020, the forgoing was presented to the Clerk of the Court for filing and uploading to the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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